

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIAApplication of Pacific Gas and Electric Company for Approval of
2013-2014 Statewide Marketing, Education, and Outreach Program
and Budget. (U39M)Application 12-08-007
(Filed August 2, 2012)

And Related Matters.

Application 12-08-008
Application 12-08-009
Application 12-08-010**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM
NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 15-08-033**

Intervenor: The Utility Reform Network	For contribution to Decision (D.) 15-08-033
Claimed: \$ \$10,679.98	Awarded: \$10,679.98
Assigned Commissioner: Carla J. Peterman	Assigned ALJ: Stephen C. Roscow

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision authorizes 2016 bridge funding to enable the Center for Sustainable Energy to continue to implement the Statewide Marketing and Outreach Plan authorized in Decision 13-12-038, in the same manner and under the same governance structure as authorized in that decision.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub.
Util. Code §§ 1801-1812:**

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	April 16, 2015	April 16, 2015
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	May 18, 2015	May 18, 2015

4. Was the NOI timely filed?		Yes. See Comment 2
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	See Comment #1	R.14-05-001
6. Date of ALJ ruling:	See Comment #1	9/5/14
7. Based on another CPUC determination (specify):	See Comment #1	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes.
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001	R.14-05-001
10. Date of ALJ ruling:	September 5, 2014	9/5/14
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		Yes.
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.15-08-033	D.15-08-033
14. Date of issuance of Final Order or Decision:	August 28, 2015	August 28, 2015
15. File date of compensation request:	October 27, 2015	October 27, 2015
16. Was the request for compensation timely?		Yes.

C. Additional Comments on Part I:

#	Intervenor’s Comment(s)	CPUC Discussion
1	TURN did not receive an affirmative ruling on its Notice of Intent in this proceeding. As explained in the Commission’s Intervenor Compensation guide, “normally, an ALJ Ruling needs not be issued unless: (a) the NOI has requested a finding of “significant financial hardship” under § 1802(g). (b) the NOI is deficient; or (c) the ALJ desires to provide guidance on specific issues of the NOI.” (page 12) Since none of these factors apply to the NOI submitted in this proceeding, there was no need for an ALJ ruling in response to TURN’s NOI.	<p>We address the NOI and confirm TURN’s eligibility in this decision.</p> <p>TURN’s significant hardship and status as a Category 3 customer is confirmed in the 9/5/14 ALJ Ruling in R.14-05-001, which also applies here.</p> <p><i>See also</i> TURN’s customer status and showing of significant financial hardship in Part I.</p>

Comment 2		The ALJ's 5/16/15 email ruling set May 22, 2015 as the deadline for parties to submit their NOIs.
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PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p>1. Value of Energy Upgrade California ("EUC")</p> <p>TURN researched past EUC/Statewide Marketing, Education & Outreach (ME&O) activities and reviewed evaluations of the effectiveness of the program to date. TURN supported the Center for Sustainable Energy ("CSE") continuing as the program administrator for the Statewide ME&O/ EUC program and supported bridge funding at the current annual funding level for the program for 2016, until it could be fully evaluated. Decision 15-08-033 adopted this recommendation.</p> <p>TURN also supported maintaining the existing governance structure and oversight and approval processes for the Statewide ME&O program, which D.15-08-033 adopted.</p>	<p>- TURN PHC Statement, April 6, 2015, pp. 1-3.</p> <p>- D.15-08-033: p. 7, 9, & 13; COL # 2 & 3- see p. 22.</p> <p>- TURN PHC Statement, April 6, 2015, p. 3.</p> <p>- D.15-08-033: p. 11 & 14; COL #18, see p. 25.</p>	<p>Verified. CSE, Greenlining, and ORA also shared this position.</p>
<p>2. Metrics for Evaluating the Statewide ME&O Program</p> <p>In its PHC Statement, TURN supported a thorough evaluation of the statewide ME&O program before any post-2016 funding is granted. TURN also supported the use of metrics that determine if</p>	<p>- TURN PHC Statement, April 6, 2015, p. 2.</p>	<p>Verified.</p>

<p>“measurable progress” has been made and if value has been provided to ratepayers. In its Comments on the PD TURN recommended that new metrics for evaluating the statewide ME&O program should be proposed and reviewed by the Commission and interested parties before an additional 6 months of funding is granted. Decision 15-08-033 adopted this recommendation.</p>	<p>- TURN Comments on PD, pp. 2-3.</p> <p>- D.15-08-033, p. 21; pp. 22-23, COL #5.</p>	
<p>3. Compliance for CSE TURN developed recommendations to ensure proper oversight of the statewide ME&O program and CSE’s compliance with program metrics. TURN drafted comments on the proposed decision recommending that CSE be required to make an adequate showing that it has met the previous set of program metrics in its request for an additional 6 months of funding for the EUC program. The Commission modified the PD to adopt this recommendation stating that approval of the Advice Letter seeking interim funding should be “contingent on CSE meeting the targets specified in D.13-12-038, in CSE’s Advice Letter 49-A, and in any follow up interim advice letters.”</p>	<p>- TURN PHC Statement, April 6, 2015, p. 2.</p> <p>- TURN Comments on PD, p. 4.</p> <p>- D.15-08-033, p. 21; p. 22-23, COL #5.</p>	<p>Verified.</p>
<p>4. Coordination with IDSR Proceeding (R.14-10-003) TURN’s Pre-hearing Conference Statement supported bridge funding for EUC because the integrated demand side resources (IDSR) proceeding has an ambitious scope and may not</p>	<p>- TURN PHC Statement, April 6, 2015, p. 1.</p>	<p>Verified.</p>

<p>issue a Decision by year-end 2015. In Comments on the proposed decision, TURN raised the fact that the issue of statewide ME&O had not been addressed in the IDSR proceeding (R.14-10-003) to date and that statewide ME&O was not included in the scope of the second phase of the IDSR proceeding according to the proposed decision in R.14-10-003, issued August 13, 2015. In comments on the proposed decision, TURN recommended that the Commission confirm that a full evaluation of Energy Upgrade California and the future of the statewide ME&O program will be addressed in R.14-10-003 or in another proceeding in the near future. In response to TURN's comments the proposed decision was revised so that questions regarding the post-2016 statewide ME&O program will be addressed in a third phase of A.12-08-007.</p>	<p>- TURN Comments on the Proposed Decision, pp. 1-2.</p> <p>- D.15-08-033, pp. 19-20; p.21, FOF #5; p.22, COL #1 & 4.</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding? ¹	Yes	Yes.
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Yes.
c. If so, provide name of other parties: Greenlining Institute; Joint Parties; The Office of Ratepayer Advocates (ORA).		Yes.
d. Intervenor's claim of non-duplication:		Accepted.

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

TURN worked diligently to avoid duplication with other like-minded intervenors by avoiding devoting time to issues that were comprehensively addressed by other intervenors. TURN notes that while ORA was a party to the proceeding, they did not actively participate in the early stages of the proceeding and did not file a PHC Statement. TURN coordinated with other intervenors as appropriate (i.e. when there would be savings in the overall time devoted to the case) but also took positions adverse to ORA and other intervenors on some issues. TURN largely argued for entirely unique positions on other contested issues in the proceeding.

Due to the relatively small number of hours that TURN devoted to each issue in the proceeding, and the wide range of contributions attributable to TURN's participation, the Commission should not conclude that any reductions in compensation are warranted based on duplication of effort.

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

a. Intervenor's claim of cost reasonableness:

TURN's request for intervenor compensation seeks an award of approximately \$10,500 as the reasonable cost of our participation in the proceeding to date. In light of the quality of TURN's work, the importance of the issues addressed in this phase of the proceeding, and the magnitude of TURN's substantial contribution to the proceeding and the resulting decision, the Commission should have little trouble concluding that the amount requested is reasonable.

TURN's advocacy, reflected in D.15-08-033, addressed policy and process matters rather than specific rates or disputes over particular dollar amounts. As a result, TURN cannot easily identify precise monetary benefits to ratepayers from our work related to D.15-08-033, given the nature of the issues presented. While it is difficult to place a dollar value on such issues, TURN submits that our participation should result in substantial benefits in the form of a seamless continuation of the Statewide ME&O program and more accountability for CSE as the program administrator. TURN played a critical role in this proceeding, as the only voice for ratepayers during the early stages of the proceeding. Given the Commission's reliance in the final decision on TURN's recommendations for the process by which CSE can apply for additional funding to continue the program, the metrics used to evaluate the program, and the fact that the D.15-08-033 based its determination to continue this proceeding to conduct a comprehensive review of the Statewide ME&O program next year based on TURN's recommendations, there should be no dispute that the benefits of TURN's participation far exceed the cost of that

CPUC Discussion

Accepted.

<p>participation.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable given the issues at stake in the rulemaking and the adopted outcomes.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>Given TURN's unique contributions to the final resolution of contested issues in this phase of the proceeding, the amount of time devoted by its staff is fully reasonable. This is a very small request because this is an unusual proceeding that was limited to a few key issues and did not require parties to file many pleadings. TURN did not retain any outside consultants to assist with this case and devoted the minimum number of hours to reviewing rulings, drafting pleadings, reading comments submitted by other parties, and evaluating the proposed decision. TURN did not conduct formal discovery or perform significant amounts of independent research. TURN's pleadings were highly substantive given the amount of time devoted to the task.</p> <p>The small number of hours devoted to the range of issues in this case demonstrates the efficiency of TURN's attorneys. Moreover, the time devoted to each task was reasonable in light of the complexity of the issues presented. Given the level of success achieved by TURN in this proceeding across a range of issues, the amount of time devoted by staff is fully reasonable.</p> <p><u>Reasonableness of Staffing</u></p> <p>TURN deployed and used its resources for this proceeding in the most reasonable and efficient means possible under the circumstances. TURN devoted one attorney to this proceeding and did not rely on outside consultants for the work related to this request. This attorney only sought advice from senior attorneys familiar with this subject matter on two occasions. TURN's attorney was Elise Torres.</p> <p>Ms. Torres sought background information regarding this proceeding from William Nusbaum and Hayley Goodson. Mr. Nusbaum was the lead attorney on the first phase of this proceeding and Mr. Goodson is TURN's lead attorney on energy efficiency issues and is very familiar with programs administered under Energy Upgrade California. TURN's decision not to rely on outside consultants for the work claimed in this request reduced the total number of personnel and hours required.</p> <p><u>Compensation Request</u></p> <p>TURN's request also includes 8 hours devoted to the preparation of compensation-related filings. The time devoted to this compensation request is appropriate and should be found to be reasonable especially because this was the first time the lead attorney prepared a compensation request.</p>	<p>Accepted.</p>

<p>c. Allocation of hours by issue: TURN has allocated all of our attorney time by issue area or activity, as evident on our attached timesheets. The following codes relate to specific substantive issue and activity areas addressed by TURN. TURN also provides an approximate breakdown of the number of hours spent on each task and the percentage of total hours devoted to each category.</p> <p>GP – 11 hours – 26% of total General Participation work essential to participation that typically spans multiple issues and/or would not vary with the number of issues that TURN addresses.</p> <p>This includes reviewing the initial application, utility filings and motions, ACR & ALJ’s March 6, 2015 Scoping Memo and Ruling and review of the proposed decision. TURN also includes in this category time devoted to attending and preparing for the PHC and the time spent editing and finalizing TURN’s comments on the PD.</p> <p>Coord. – 2.25 hours – 5% of total These include the very limited amount of time TURN spent discussing the proceeding with ORA and determining which issues TURN and ORA would each focus on.</p> <p>Value of Energy Upgrade California (VoEUC) – 13 hours – 30% of total Work evaluating the effectiveness of the Statewide ME&O program, specifically Energy Upgrade California (EUC) to date. Includes researching past EUC activities, budget, governance structure and reviewing past program evaluations. Also includes meeting with CSE to discuss the EUC program and why bridge funded is necessary. Review of the ACR & ALJ’s March 6, 2015 Scoping Memo and Ruling and CSE’s comments in response to the ruling. Includes drafting a PHC Statement and reviewing other parties’ PHC Statements.</p> <p>Metrics – 7 hours – 16% of total Work developing recommendations for establishing new metrics to evaluate the success of the Statewide ME&O program. Includes reviewing March 2015 ME&O Evaluation Plan and past TURN and ORA filings on Advice Letters establishing metrics for the program. Also includes discussing past program evaluation activities with Bill Nusbaum who acted as TURN’s representative in the first phase of the proceeding. Includes reviewing the proposed decision and drafting comments on the proposed decision regarding this topic.</p> <p>Compliance – 4.25 hours – 10% of total Work developing recommendations to ensure proper oversight of the Statewide ME&O program and compliance of CSE with program metrics.</p>	<p>Verified.</p>
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Includes reviewing D.13-12-037 and Advice Letter 49-A to research past program targets and established compliance mechanisms. Also includes discussing past program evaluation activities with Bill Nusbaum. Includes reviewing the proposed decision and drafting comments on the proposed decision regarding this topic.

Coord. With IDSR Proceeding (IDSR) – 5.5 hours – 13% of total

Work to ensure sufficient coordination between both proceedings regarding when a full review of the statewide ME&O program will take place and when the Commission will address the issue of the post-2016 statewide ME&O program. Includes drafting comments on the proposed decision raising concerns that the issue of statewide ME&O had not been addressed in the IDSR proceeding (R.14-10-003). Also includes discussing the issue with CSE to see if they had any insight regarding which proceeding would be best to address the post-2016 statewide ME&O program.

COMP – 8 hours

Work preparing TURN's notice of intent to claim compensation and the final request for compensation.

TURN submits that under the circumstances this information should suffice to address the allocation requirement under the Commission's rules. Should the Commission wish to see additional or different information on this point, TURN requests that the Commission so inform TURN and provide a reasonable opportunity for TURN to supplement this showing accordingly.

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Elise Torres	2015	40.5	\$215	See Comment 1	\$8,707.5	40.5	\$215	\$8,707.50
Bill Nusbaum	2015	2	\$465	D.15-06-018, p. 25, D.15-08-023, p. 24	\$930.00	2	\$465	\$930.00
Hayley Goodson	2015	0.5	\$355	D.15-08-023, p. 24	\$177.50	0.5	\$355	\$177.50
Subtotal: \$ 9,815.00						Subtotal: \$9,815.00		

INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Elise Torres	2015	8	\$107.50	@ 50% of \$215	\$860	8	\$107.50	\$860.00
Subtotal: \$860.00						Subtotal: \$860.00		
COSTS								
#	Item		Detail		Amount	Amount		
1	Copies		Copying of pleadings for ALJ and Commissioner Offices		\$1.40	\$1.40		
2	Postage		Postage for pleadings to CPUC		\$3.58	\$3.58		
Subtotal: \$4.98						Subtotal: \$4.98		
TOTAL REQUEST: \$ 10,679.98						TOTAL AWARD: \$10,679.98		
ATTORNEY INFORMATION								
Attorney			Date Admitted to CA BAR ²		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation	
Elise Torres			December 9, 2011		280443		No	
Hayley Goodson			December 5, 2003		228535		No	
Bill Nusbaum			June 7, 1983		108835		No	

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Daily Time Records for Attorneys and Experts
Attachment 3	Cost/expense details
Attachment 4	Hours Allocated by Issue
Comment 1	2015 Hourly Rate for Elise Torres This is the first Request for Compensation in which TURN seeks an hourly rate for substantive work performed by Ms. Torres in 2015. TURN requests an

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

	<p>hourly rate of \$215, which we submit is a reasonable rate for an attorney of her training and experience.</p> <p>Ms. Torres is a 2011 graduate of UC Hastings School of Law and has been a member of the California bar since 2011. At UC Hastings, she completed a concentration in Public Interest Law and was the Notes and Comments Editor of the Hastings Environmental Law Journal.</p> <p>Upon graduation in mid-2011, Ms. Torres received the prestigious Bridge Fellowship and completed her fellowship at the Center for Biological Diversity as an associate attorney, focusing on land use and endangered species protection in California. Ms. Torres was the lead associate on California Environmental Quality Act and Endangered Species Act litigation during her 6-month Fellowship term. Through this position Ms. Torres refined her legal writing and oral advocacy skills. From January 2012 through June 2012, Ms. Torres was a discovery attorney for Quinn-Emmanuel in San Francisco and worked on significant intellectual property litigation. In that capacity she became expert at all facets of discovery including assessing the relevance of materials and compiling evidence to support key litigation positions.</p> <p>In June 2012 Ms. Torres joined the Office of Ratepayer Advocates at the CPUC as a Regulatory and Legislative Analyst. Although not employed as an attorney <i>per se</i>, her responsibilities as a regulatory analyst included researching and analyzing utility applications and drafting testimony, briefs and comments on proposed decisions. She also testified on behalf of ORA at evidentiary hearings, and gained valuable experience negotiating on ORA's behalf in settlement meetings and lobbying for ORA's positions in ex parte meetings with Commissioners and Commissioner advisors. Thus she gained valuable experience and skills directly relevant to her future work as an attorney in CPUC proceedings.</p> <p>In April 2014, Ms. Torres joined the California Department of Insurance as a staff attorney. There she represented the Department in administrative proceedings and reviewed re-insurance company applications for compliance with regulations and corporate governance requirements. In that capacity she became expert in advocacy in administrative proceedings and the California administrative procedure act.</p> <p>In September 2014 Ms. Torres joined TURN as a Staff Attorney, and immediately assumed responsibility for an ongoing caseload, serving as TURN's primary attorney in a number of active proceedings, and as co-counsel in several others, including the 2015 SCE GRC (A.13-11-003) and the Net Energy Metering 2.0 rulemaking (R.14-07-002). At the start of career at TURN, Ms. Torres assumed the role as TURN's lead attorney on the SDG&E Electric Vehicle Infrastructure application (A.14-04-014), the Integrated Demand Side Resources rulemaking (R.14-10-003), the Water-Energy Nexus rulemaking (R.13-12-011) and the Alternative Fuel Vehicle Infrastructure rulemaking (R.13-11-007).</p>
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TURN submits that the \$215 rate we are requesting for Ms. Torres for work performed in 2015 is conservative and very reasonable. Ms. Torres joined TURN with significant experience in consumer advocacy at the CPUC and in attorney positions that honed her discovery, case strategy, legal writing and other litigation skills that are all directly relevant to the work an attorney performs in a CPUC proceeding. The quality and quantity of her experience enabled her to assume substantial responsibility for TURN's advocacy work in important proceedings such as this one, with a much shorter learning curve than would have been required by a less-experienced attorney or one not familiar with public utility regulation.

At the start of 2015 Ms. Torres had approximately 1.5 years of experience as a practicing attorney and almost 2 additional years of directly relevant utility regulation experience as an analyst for ORA. Under the circumstances, TURN submits the ORA experience should be given partial credit and treated as the equivalent of approximately 1 year of directly relevant legal experience, as it gives her particularly relevant knowledge and utility regulation experience for purposes of participating and advocating in Commission proceedings on behalf of TURN. Thus at the start of 2015, for purposes of determining where she falls on the adopted scale, the Commission should find Ms. Torres had the equivalent of 2.5 years of experience as an attorney. The 2015 range for attorneys with 0-2 years of experience is \$165 – \$220 (Res. ALJ-308). TURN's request of \$215 is within this range and is conservative given that Ms. Torres' experience as of the start of 2015 is at the top of the range, and her additional experience as a regulatory analyst at the CPUC.

For comparison purposes, "close peers" of Ms. Torres that have had rates recently set by the Commission include Rebecca Davis of Clean Coalition (California Bar admission in 12/10, awarded \$205 as an hourly rate in 2011, her first year, and \$210 in 2012, her second year – D.13-12-021, pp. 10-12); Karla Gilbride of Disability Rights Advocates (Bar admission in 7/09 who was awarded \$200 as an hourly rate in 2010, her first year, and \$205 in 2011, her second year – D.13-12-026, pp. 10-12); and Nicole Blake of Consumer Federation of California (Bar admission in 1/10 who was awarded \$200 as an hourly rate in 2011, before the end of her second year). In each of these cases, the adopted rate was just below the upper end of the range for attorneys with 0-2 years experience. The \$215 sought here is similarly just below the upper end of the current range of \$165-\$220 for 2015 work. The rate of \$215 for Ms. Torres' work in 2015 is reasonable and should be granted by the Commission.

D. CPUC Disallowances and Adjustments:

Item	Reason
Elise Torres' Rate	TURN requests an hourly rate of \$215 for Torres' work in this proceeding. Torres does not yet have an established rate with the Commission. Torres was admitted to the State Bar of California in December 2011. For 2015, Torres would have been a licensed attorney for almost 4 years, placing her into the 3-4 year experience bracket of attorneys. Resolution ALJ-308 places attorneys with 3-4 years of experience at \$215-\$250 an hour. As such, we find the rate of \$215 per hour to be appropriate and reflective of Torres' experience.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
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B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes
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FINDINGS OF FACT

1. The Utility Reform Network has made a substantial contribution to D.15-08-033.
2. The requested hourly rates for The Utility Reform Network's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$10,679.98.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. The Utility Reform Network shall be awarded \$10,679.98.

2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2015 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 10, 2016, the 75th day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX
Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1508033		
Proceeding(s):	A1208007		
Author:	ALJ Roscow		
Payer(s):	Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Edison Company.		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/ Disallowance
The Utility Reform Network (TURN)	10/27/15	\$10,679.98	\$10,679.98	N/A	N/A

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Elise	Torres	Attorney	TURN	\$215	2015	\$215
Bill	Nusbaum	Attorney	TURN	\$465	2015	\$465
Hayley	Goodson	Attorney	TURN	\$355	2015	\$355

(END OF APPENDIX)